UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 3 0 2015

CERTIFIED MAIL 7009 1680 0000 7677 9111
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. John M. Lang
President
JL DI-Coat Company, Incorporated
1213 South 7th Street
Sheboygan, Wisconsin 53081

Re: Notice of Violation
Compliance Evaluation Inspection
WID006071179

Dear Mr. Lang:

On November 19, 2014, a representative of the U.S. Environmental Protection Agency inspected the JL DI-Coat Company, Inc. (JL DI-Coat), facility located in Sheboygan, Wisconsin. As a large quantity generator of hazardous waste, JL DI-Coat is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate JL DI-Coat's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by JL DI-Coat, EPA's review of records pertaining to JL DI-Coat, and the inspector's observations, EPA has determined that JL DI-Coat has unlawfully stored hazardous waste without a license or interim status as a result of JL DI-Coat's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirement(s) violated by JL DI-Coat as of the date of the inspection in paragraphs 1-4, below.

Also, EPA has determined that JL DI-Coat violated RCRA requirements related to hazardous waste determinations, manifests, land disposal restrictions, and annual reporting, as described in paragraphs 5-8, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, JL DI-Coat violated the following large quantity generator license exemption requirements:

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

1. RCRA Training Program Content

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0016(1)(c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)(3)], a large quantity generator must ensure, at a minimum, the training program be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including, where applicable, all of the following: 1. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment. 2. Key parameters for automatic waste feed cut–off systems. 3. Communications or alarm systems. 4. Response to fires or explosions. 5. Response to groundwater contamination incidents. 6. Shutdown of operations.

During the inspection of records, there was no documentation that indicated that responses to fires or explosions were part of the RCRA hazardous waste management training. Also, this information was absent from the facility's contingency plan that could have been covered during the contingency plan implementation part of the training.

2. RCRA Annual Review of Training and Records

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0016(3) and (4)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(c) and (d)(4)], a large quantity generator must ensure that facility personnel take part in an annual review of the initial training required in sub. (1) of this section. Also, a large quantity generator must keep records that document that the training or job experience required under subs. (1), (2) and (3) of this section has been given to, and completed by, facility personnel.

During the inspection of records, there were no facility annual RCRA training sign-in sheets or other documentation provided that documented that the annual RCRA trainings were conducted and received for years 2012 and 2013 for the following five current employees: Nick Ries, Barb Trammell, Lee Messman, Dave Ries, and Steve Messman, and one additional employee – Robert Collins for 2013.

3. RCRA Training Documents and Records

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0016(4)(b) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)(2)], a large quantity generator must maintain all of the following documents and records at the facility: a written job description for each position listed under par. (a). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position

During the inspection of records, there was no documentation of training record requirements provided that included the following: job descriptions for each job title related to hazardous waste management.

4. Contingency Plan Content

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(1) [40 C.F.R. §§ 262.34(a)(4) and 265.52(a)], a large quantity generator must ensure the contingency plan describes the actions facility personnel must take to comply with ss. NR 665.0051 and 665.0056 in response to fires, explosions or any unplanned sudden or non−sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.

Also, under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(4) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)], a large quantity generator must ensure that plan shall list names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see s. NR 665.0055), and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.

Furthermore, under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(5) [40 C.F.R. §§ 262.34(a)(4) and 265.52(e)], a large quantity generator must ensure the plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.

During the inspection of records, there was no home address listed in the plan for Mr. Lang. The plan did not include the following: location descriptions for the decontamination equipment (eye wash stations); and descriptions for facility actions in response to fires, explosions, and spills at the facility.

Summary: By violating the requirements for a license exemption, above, JL DI-Coat became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. JL DI-Coat failed to apply for such a license. JL DI-Coat's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 670.001(3), 670.010(1) and (4) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

5. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

Also, under Wis. Admin. Code § NR 662.011(2) [40 C.F.R. § 262.11(b)], a generator must then determine if the waste is listed as a hazardous waste in subch. D of ch. NR 661 (lists of hazardous wastes).

Furthermore, under Wis. Admin. Code § NR 662.040(3) [40 C.F.R. § 262.40(c)], a generator shall keep records of any test results, waste analyses or other determinations made in accordance with s. NR 662.011 for at least 3 years from the date that the waste was last sent to on–site or off–site treatment, storage or disposal.

During the inspection of records, there was no waste determination documentation provided for the electropolish F006 wastewater treatment sludge waste stream.

6. Manifest Coding and Instructions

Under Wis. Admin. Code § NR 662.020(1) [40 C.F.R. § 262.20(a)(1)], a generator who transports, or offers for transport, a hazardous waste for off-site treatment, storage or disposal, shall prepare a manifest, OMB control number 2050–0039, on EPA Form 8700–22, and if necessary, EPA Form 8700–22A, according to the instructions in the appendix to 40 C.F.R. part 262. The specific manifest requirements include, but are not limited to entering applicable waste codes to describe each waste stream identified in Item 13.

During the inspection of records, the manifests did not include all of the applicable RCRA listed (F006) waste codes (Item 13), for the wastewater treatment sludge waste stream.

7. Land Disposal Restriction Documentation

Under Wis. Admin. Code § NR 668.07(1)(a) and (b) [40 C.F.R. § 268.7(a)(1)-(2) and (4)], a generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in rule WAC, NR §§ 668.40, 668.45, or 668.49 of the Administrative Code. This determination can be made either by testing the waste, or by using knowledge of the waste. Also, if the waste or contaminated soil does not meet the applicable treatment standard, then, the generator shall send a one–time written notice to each

treatment or storage facility receiving the waste with the initial waste shipment, and shall place a copy in the generator's file.

The inspection of manifests and records during the inspection indicated that JL DI-Coat was manifesting the hazardous waste wastewater treatment sludge incorrectly as F019 waste only. There was not a record or notice of a determination made that gave notification of all appropriate treatment and applicable prohibitions for this hazardous waste stream before it could be land disposed. Thus, there was no LDR notification available at the time of the inspection for the hazardous waste (for both F019 and F006) wastewater treatment sludge waste stream that included all applicable (both F019 and F006) RCRA hazardous waste codes.

8. Annual Reporting Requirements

Under Wis. Admin. Code § NR 662.041(1), a generator who ships any hazardous waste off–site to a treatment, storage or disposal facility within the United States shall prepare and submit a single copy of an annual report to the department by March 1 of each year. The annual report shall be submitted on department forms and cover generator activities during the previous year.

During the inspection of records, the inspector observed that the last three submitted annual hazardous waste reports were retained on-site. However, the reports for the years 2012 (submitted to WDNR on 3/28/13) and 2013 (submitted to WDNR on 5/2/14) were submitted late.

At this time, EPA is not requiring JL DI-Coat to apply for a Wisconsin hazardous waste operating license (for the areas identified above) so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1-4, above.

After the inspection, as documented in an 11/25/14 email to EPA, you took certain actions to establish compliance with certain portions of paragraph 4, above (location descriptions for the decontamination equipment (eye wash stations), and descriptions for facility actions in response to fires, explosions, and spills at the facility). The portion of paragraph 4 still not addressed, is that no home address is listed in the contingency plan for the primary emergency coordinator.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1-8. You should submit your response to Bryan Gangwisch, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WI DNR, michael.ellenbecker@wisconsin.gov
Cynthia Moore, WI DNR, cynthia.moore@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: JL DI-Coat Company, Inc.

EPA ID No.: WID006071179

ADDRESS: 1213 South 7th Street
Sheboygan, WI 53081

DATE OF INSPECTION: November 19, 2014

EPA INSPECTOR: Bryan Gangwisch

PREPARED BY: By Bryan Gangwisch — 12/3/14

Bryan Gangwisch
Environmental Scientist
Compliance Section #2

Date Completed

ACCEPTED BY: _____ — 12/4/14

Julie Morris, Chief
Compliance Section #2

Date

Purpose of Inspection
This inspection was an evaluation of JL DI-Coat Company, Inc. (JL DI-Coat), and its compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

John M. Lang, President	JL DI-Coat
Barb Trammell, employee	JL DI-Coat
Bryan Gangwisch, Environmental Scientist	U.S. EPA

Introduction
I arrived at the site at approximately 9:25 a.m. The weather consisted of snowy overcast conditions with a moderate wind, and an ambient air temperature of approximately 22 degrees Fahrenheit. I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. Mr. Lang provided me with a verbal description of the site, led the tour throughout the facility, and then attempted to provide me with the records I requested for review.

Site Description
JL DI-Coat was operating as a large quantity generator at the time of the inspection based upon hazardous waste generation rates and as stated by Mr. Lang.

The following facility description and waste generation information was stated by Mr. Lang unless otherwise noted. The facility is owned and operated by Mr. Lang, who took control of operations in 1991. JL DI-Coat performs parts coating processes that include two dedicated lines for chemical conversion (chromating) coating on die-cast aluminum parts, resin and silicate lines for impregnation on die-cast aluminum parts, and a spray line. The facility also has an electro polishing (utilizing sulfuric acid) line that is dedicated for stainless steel parts only. The facility is comprised of the process areas and the Warehouse. There are approximately 8 total employees that work two shifts at the facility.

There was one hazardous waste storage area located in the facility. The containers that are used to manage hazardous waste at JL DI-Coat consist of 55-gallon drums or 250-gallon totes. There were no hazardous waste tanks at the facility. No waste is stored outside of the facility. There were no ponds on the facility property.

The main waste streams generated at JL DI-Coat consist of: waste nitric acid, wastewater treatment sludge, and a waste resin line sludge. The hazardous waste codes associated with the main waste types that are generated at JL DI-Coat consist of: D002 and F019. The generated spent lead acid batteries were being taken to a local battery retailer as part of a reclaim exchange

program. The facility's fork lifts are serviced by an outside vendor. Minimal amounts of used oil is generated from the maintenance of an air compressor. Scrap metal is generated and is being picked up to be recycled.

Excess wastewater from the chemical conversion coating process lines and the electropolish line is transferred to a change tank for proper pH adjustment. The wastewater is then transferred into a 1,500-gallon holding tank, and then is transferred to a gas-powered evaporator. There are two gas-powered evaporators (approximately 200-gallon capacity) at the facility, but only one is active. The water evaporates and the sludge thickens. The water/sludge is then transferred to a steam-powered evaporator. The sludge is cleaned out of the gas-powered evaporator after every 10 loads (or two weeks approximately). There are three steam-powered evaporators at the facility. The sludge from the steam evaporators is dry enough to get placed into drums for off-site disposal as hazardous waste F019.

Seven of the eight manhole covers/drains in the facility have been permanently plugged by JL DI-Coat, with the exception being in the bathroom. JL DI-Coat does not have the equipment to meet wastewater discharge limits, so the facility does not discharge to the sewer as stated by Mr. Lang.

Site Tour

A physical walk-through of the facility was conducted at approximately 10:05 a.m. We started at the Resin Impregnating Line. On a pallet, there was one 150-gallon container that contained Resin Impregnating Line wastewater/sludge that is a non-hazardous waste as stated by Mr. Lang. There was a 75-gallon transfer bin under the line that contained the same waste that gets pumped to the 150-gallon container as stated by Mr. Lang.

Next, I inspected the Spray Line. The line was not in service at the time of the inspection, but the material in the baths was usable as stated by Mr. Lang.

At the Maintenance Area, there was one 5-gallon pail that contained skimmed material off the Spray Line as stated by Mr. Lang. Pictures were taken.

Next, I inspected the Electropolish Line. There was no waste in this area at the time of the inspection.

At the Warehouse, there was one drum that contained product caustic soda rust inhibitor as stated by Mr. Lang. There were bags that contained product ammonium bifluoride as stated by Mr. Lang. In bins, there were incoming and outgoing parts stored as stated by Mr. Lang. There was one sandblaster observed, and there was no waste generated from it as stated by Mr. Lang. There was one drum that contained product acid as stated by Mr. Lang. There were two empty 250-gallon totes.

Still in the Warehouse, I inspected the 90-Day Hazardous Waste Storage Area. There was one 300-gallon tote that contained product nitric acid as stated by Mr. Lang. There were two 250-

gallon totes that contained hazardous waste nitric acid. The first tote was labeled as "Hazardous Waste" and "Nitric Acid", was dated 11/7/14, and was closed. The other tote was labeled as "Hazardous Waste" and "Nitric Acid", was dated 10/24/14, and was closed. There were thirteen 55-gallon drums, situated on pallets, which contained hazardous waste F019 sludge. All thirteen drums were labeled as "Hazardous Waste" and "F019", were dated with accumulation start dates within ninety days at the time of the inspection and were all stored closed. There were two 55-gallon non-hazardous waste drums situated on pallets. Both drums were labeled as "Non-Hazardous Waste", "Rinse Waters", and "Non-Regulated Material", and were closed. Mr. Lang stated that the two drums of non-hazardous waste rinse waters were from the Resin Impregnating Line. There were three 55-gallon drums that contained product silicate impregnating solution as stated by Mr. Lang. There were three empty bath containers and four empty 55-gallon drums. There was one 250-gallon tote that contained product caustic soda as stated by Mr. Lang. Aisle space was sufficient. There was a fire extinguisher, spill containment kit, eye wash station, and a phone in the vicinity.

At the gas-powered evaporator area, I observed gas-powered evaporator 2, which was not in use as stated by Mr. Lang. I then inspected gas-powered evaporator 1. Pictures were taken. I then observed the 1,500-gallon holding tank that feeds evaporator 1, and the change tank (approximately 200 gallons) from evaporator 1. Pictures were taken.

On the way to inspect the Shipping Office, there was one 250-gallon tote that contained product caustic soda as stated by Mr. Lang.

At the Shipping Office, there was no waste at the time of the inspection. There were several empty 55-gallon drums located above the Shipping Office as stated by Mr. Lang.

Next, I inspected the Production Area. There was one 300-gallon holding tank that contained the non-hazardous waste resin impregnating line rinse water as stated by Mr. Lang. There was one 500-gallon steam evaporator tank that was dedicated for the non-hazardous waste resin impregnating line water. The non-hazardous waste resin water sludge goes to Badger Disposal as stated by Mr. Lang. There was one 300-gallon holding tank for the steam evaporators. Pictures were taken. The steam evaporators were observed. Pictures were taken. The hazardous waste F019 sludge is drummed directly after removal from the steam evaporators as stated by Mr. Lang.

At the Barrel Chromate Line, exclusively trivalent chrome is used as stated by Mr. Lang. There was no waste in this area at the time of the inspection.

Next, I inspected the Silicate Impregnating Line. There was no waste in this area at the time of the inspection.

At the Hand Chromate Line, exclusively trivalent chrome is used as stated by Mr. Lang. There was no waste in this area at the time of the inspection.

I observed the change tank where the initial wastewater enters from the process lines for pH adjustment. There were several empty drums in this area.

There was no universal waste or used oil observed during the inspection.

Record Review

The review of manifests was conducted. Manifests are kept on-site for at least 3 years. The most recent manifests show that all hazardous waste is sent to the following TSDF: Badger Disposal of WI, Inc., (WID988580056). The following transporter was also used: Badger Disposal of WI, Inc., (WID988580056). All LDR notices were available for review on each manifest for each waste stream. Mr. Lang and Ms. Trammell sign the manifests.

The last three submitted annual hazardous waste reports were retained on-site. However, the reports for the years 2012 (submitted to WDNR on 3/28/13) and 2013 (submitted to WDNR on 5/2/14) were submitted late.

The documented weekly inspection logs were reviewed. Ms. Trammell conducts the weekly inspections and stated that hazardous waste container inspections are conducted every Thursday. Emergency equipment inspections were also occurring.

Waste determinations were documented through profiles or determined by generator knowledge (MSDS). I reviewed the waste profiles for the following waste streams: wastewater treatment sludge F019; spent nitric acid D002; and the resin rinse water. I also reviewed an MSDS for a chemical constituent (Ultraseal PC504/66 sealant) used in the resin impregnating process. There was no waste determination documentation provided for the electropolish F006 wastewater sludge waste stream/code.

There was a contingency plan in place for the facility. The plan was titled "Emergency Contingency Plan." The plan was last revised on August 6, 2014. The reason for the revision to the plan was to update it as a new document as stated by Mr. Lang. The primary emergency coordinator listed in the plan for the facility was Mr. Lang. There was no home address listed in the plan for Mr. Lang. Copies of the contingency plan have been sent to all required local emergency authorities as stated by Mr. Lang. The plan did not include the following: location descriptions for the decontamination equipment (eye wash stations); and descriptions for facility actions in response to fires, explosions, and spills at the facility. The Sheboygan Fire Department tours the facility twice per year as stated by Mr. Lang. The facility is equipped with a public address/paging system as stated by Mr. Lang. There had been no spills or fires related to hazardous waste as stated by Mr. Lang.

There was a recent RCRA hazardous waste management training program in place at the facility. There was documented hazardous waste training that occurred on August, 25, 2014. However, there were no facility annual RCRA training sign-in sheets or other documentation provided that documented that the annual RCRA trainings were conducted and received for years 2012 and 2013 for the following five current employees: Nick Ries, Barb Trammell, Lee Messman, Dave

Ries, and Steve Messman, and one additional employee – Robert Collins for 2013. There was no documentation of training record requirements provided that included the following: job descriptions for each job title related to hazardous waste management.

Closing Conference

I summarized the RCRA requirements for the following: waste determination documentation; RCRA training records; contingency plan completeness; and the timeframe for the submittal of the annual hazardous waste report identified during the inspection. The inspection concluded at approximately 1:25 p.m.

JL DI-Coat made no claim of confidential business information related to any pictures taken or documents received by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- copy of the facility's contingency plan dated 8/6/14
- copy of the facility's "Waste Handling Procedures" dated 8/6/14

Documents given to JL DI-Coat during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- SHWEC Pollution Prevention handout

A photo log is attached consisting of fourteen (14) photos taken by U.S. EPA during the inspection.

1. A view, at the Maintenance Area, of a 5-gallon bucket that contained skimmed material off the Spray Line.

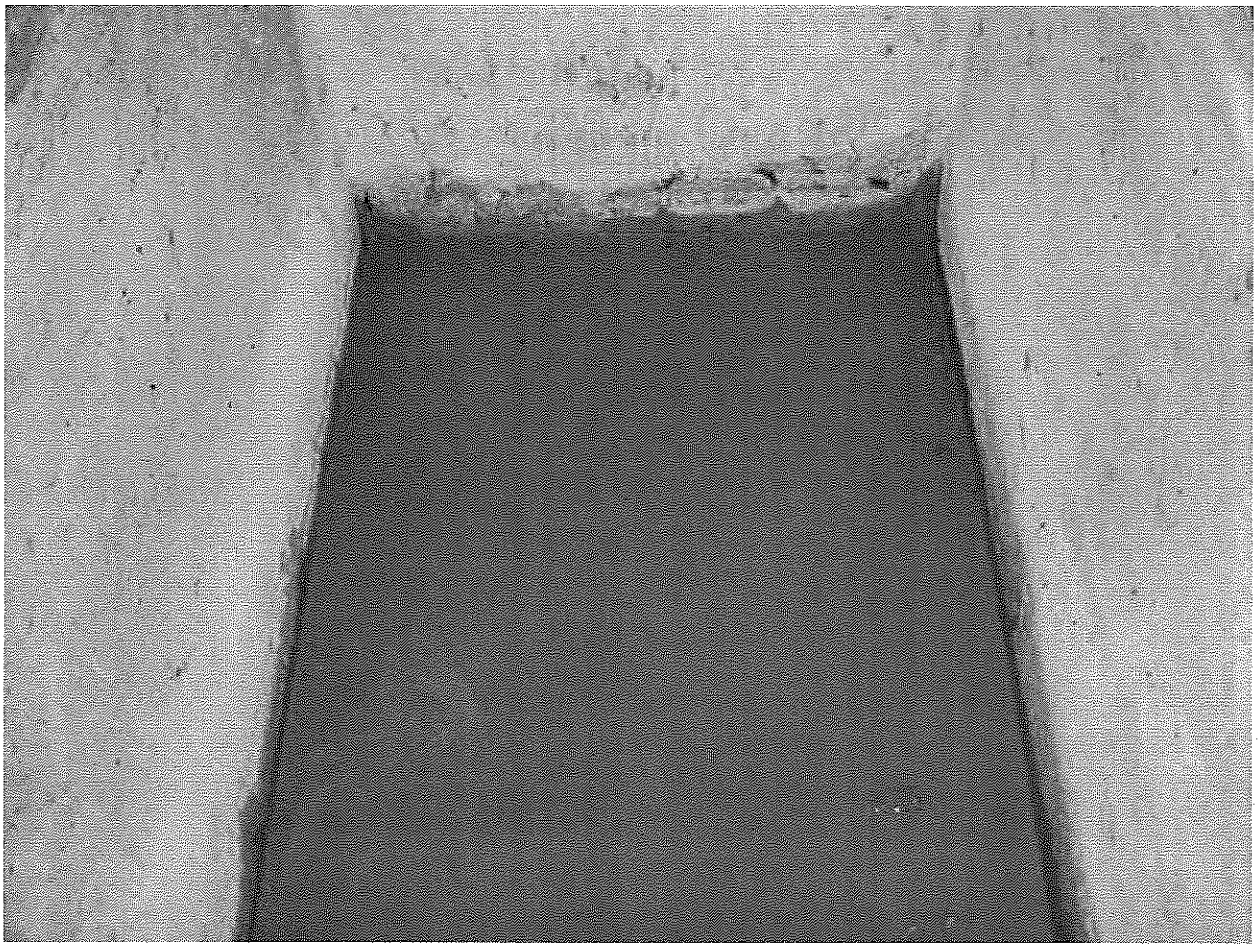
JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

2. Another view of the same bucket (as in photo # 1).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

3. A view, at the gas-powered evaporator area, of the change tank from evaporator 1.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14



4. A view, of the water/sludge inside of the same change tank (as in photo # 3).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

5. A view, at the gas-powered evaporator area, of evaporator 1.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

6. Another view of the same change tank and evaporator 1 (as in photos # 3, # 4, and # 5).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

7. A view, at the gas-powered evaporator area, of the 1,500-gallon holding tank that feeds evaporator 1.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

8. Another view of the same holding tank (as in photo # 7).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

9. A view, at the Production Area, of the 300-gallon holding tank for the steam evaporators.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

10. Another view of the same holding tank (as in photo # 9).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

11. A view, at the Production Area, of one of the steam evaporators.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

12. Another view of the same steam evaporator (as in photo # 11).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

13. A view, at the Production Area, of one of the other steam evaporators.

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

14. Another view of the same steam evaporator (as in photo # 13).

JL DI-Coat Company, Inc., Sheboygan, WI
Bryan Gangwisch, U.S. EPA 11/19/14

11/19/14 JL DI- Coat Company, Inc. WID006071179

LARGE QUANTITY GENERATOR INSPECTION

Revision: 12/03/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated. F006 sludge from electroplating line	N	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used. F019 Sludge Combined w/ F006 process	N	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	N/A	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	N	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	N	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	N/A	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030

LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2)
N. Placards are offered to the initial transporter.	Y	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge. FOOS sludge	N	668.07(1)
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	N/A	668.07(1)
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions. FOOS sludge	N	668.07(1)
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	N/A	668.09(2)
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.034(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year. YEARS 2012 & 2013	N	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	N/A	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	N/A	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	N/A	662.034(1)(d)
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	Y	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed. revised to update it as new document	N	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	N	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d)

LARGE QUANTITY GENERATOR INSPECTION

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d)
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. (5) Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	N	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)). YEARS 2012 & 2013	N	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. (2) Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. (4) Records that required training has been given to each employee.	N	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c)

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	N/A	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	N/A	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N/A	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)

Section 9: Subchapter BB Standards for Equipment Leaks

D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).	N/A	662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	N/A	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.		
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).		662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.		

Section 10: Subchapter CC Level 1 Container Standards

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N/A	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers		
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.		
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.		662.034(1)(a)1
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).		662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).		662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).		662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)1

Section 10: Subchapter CC Level 1 Container Standards

O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	N/A	662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).		662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).		662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	N/A	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2

Section 11: Subchapter CC Level 2 Container Standards

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)	N/A	662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N/A	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

No SAAs observed during inspection

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	N	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	N/A	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	N/A	662.034(3)(a)

Section 13: Satellite Accumulation

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	N/A	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).		662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).		662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.		662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.		662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.		662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1)

Section 15: Used Oil

No used oil observed during inspection

A. Used oil is managed on-site. If NO, go to Section 16	N	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	N/A	679.22(2)
D. Used oil containers and tanks are marked "used oil".	N/A	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	N/A	679.24

Section 15: Used Oil

F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	N/A	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 16: Universal Waste

No universal waste observed during inspection

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	N/A	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N/A	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N/A	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N/A	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	N/A	673.15(3)
i. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N/A	673.16

Section 16: Universal Waste

J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	N/A	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	N/A	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N/A	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	N	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.	N/A	662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c

LARGE QUANTITY GENERATOR INSPECTION

Section 17: F006 Wastewater Treatment Sludge

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.	N/A	662.034(7)(d)5
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.	N/A	662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	Y	662.034(1)
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	Y	
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	N/A	662.034(1)(a)2